

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**[1] MARTHA DONELSON and [2] JOHN FRIEND,
ON BEHALF OF THEMSELVES AND ON
BEHALF OF ALL SIMILARLY SITUATED
PERSONS**

Plaintiffs,

vs.

**[1] UNITED STATES OF AMERICA, DEPARTMENT
OF INTERIOR; BUREAU OF INDIAN AFFAIRS;
[2] DEVON ENERGY PRODUCTION COMPANY,
L.P.; [3] CHAPARRAL ENERGY, LLC; [4] ENCANA
OIL & GAS (USA), INC.; [5] PERFORMANCE
ENERGY RESOURCES, LLC; [6] CEJA
CORPORATION; [7] CEP MID-CONTINENT, LLC;
[8] LINN ENERGY HOLDINGS, LLC;
[9] SULLIVAN & COMPANY, LLC; [10] CARDINAL
RIVER ENERGY, LP; [11] REVARD OIL & GAS
PROPERTIES, INC.; [12] BLACK LAVA
RESOURCES, LLC; [13] B & G OIL COMPANY;
[14] ORION EXPLORATION, LLC; [15] NADEL
AND GUSSMAN, LLC; [16] LAMMAMCO
DRILLING, LLC; [17] CLEAR MOUNTAIN
PRODUCTION, LLC; [18] SHORT OIL, LLC;
[19] WELLCO ENERGY, INC.; [20] RAM ENERGY
RESOURCES, INC.; [21] MARCO OIL COMPANY,
LLC; [22] BGI ROUSOURCES, LLC; [23] HALCON
RESOURCES CORPORATION; [24] THE LINK OIL
COMPANY; [25] OSAGE ENERGY RESOURCES,
LLC; [26] TOMMEY OIL COMPANY, INC.;
[27] KAISER-FRANCIS ANADARKO, LLC;
[28] HELMER OIL CORP; [29] SPYGLASS
ENERGY GROUP, LLC; AND ALL OTHER
LESSEES AND OPERATORS AND OPERATORS
WHO HAVE OBTAINED A CONCESSION
AGREEMENT, LEASE OR DRILLING PERMIT
APPROVED BY THE BIA IN OSAGE COUNTY
IN VIOLATION OF NEPA,**

Defendants.

Case No. 14-CV-316-JHP-FHM

**DEFENDANT REVARD OIL AND GAS
PROPERTIES, INC.'S MOTION TO DISMISS**

Defendant Revard Oil and Gas Properties, Inc. hereby moves to dismiss Plaintiffs' First Amended Complaint pursuant to F.R.C.P Rule 12(b)(1), (6) and (7).

In support of its Motion, Defendant Revard Oil and Gas Properties, Inc. adopts the arguments and authorities set forth in the motions filed by B&G Oil Company and Wellco Energy, Inc. [Doc. No. 124]; Devon Energy Production Co., L.P., and Linn Energy Holdings, LLC [Doc. No. 136]; The Link Company *et al.* [Doc. No. 137]; and Performance Energy Resources, L.P. *et al.* [Doc. No. 138].

Defendant Revard Oil and Gas Properties, Inc. prays that the Court dismiss with prejudice Plaintiffs' First Amended Complaint and grant it reasonable attorney fees, costs, and all other relief to which the Court determines to be just and proper.

s/ Jack H. Santee

Jack H. Santee, OBA No. 7903

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Attorney for Defendant

Revard Oil and Gas Properties, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of October, 2014, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System which will send notification of such filing to all persons who have entered their appearance as ECF registrants in this case.

s/ Jack H. Santee

Jack H. Santee